

DECLARATION OF REBECCA A. PETERSON IN SUPPORT
OF ADMINISTRATIVE MOTION TO FILE MATERIALS UNDER SEAL

1 I, Rebecca A. Peterson, declare as follows:

2 1. I am an attorney at Lockridge Grindal Nauen P.L.L.P. and represent Plaintiff in the
3 above-captioned matter. I submit this declaration in support of filing Plaintiff's Memorandum of
4 Law in Support of Class Certification ("Memo") and certain exhibits thereto under seal.

5 2. I have reviewed and complied with the Judge Orrick's Standing Order on
6 Administrative Motions to File Under Seal.

7 3. I have reviewed and complied with Civil Local Rule 79-5.

8 4. Portions of Plaintiff's Memo contain information, quotations, references to, or
9 information taken or derived from documents or materials designated by defendant WellPet LLC
10 ("Defendant") as "Confidential."

11 5. On November 30, 2017, this Court entered a Protective Order governing
12 confidential documents (ECF No. 48). The Protective Order requires that any filing containing
13 information or material designated as "Confidential" be filed under seal. *See* Protective Order at
14 12.
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16 6. Pursuant to this Court's June 19, 2020, Stipulation and Order Regarding WellPet's
17 Deadline to File a Declaration in Support of Plaintiff's Motion to Seal and because Defendant has
18 not yet filed its declaration specifying which documents and/or deposition testimony should be
19 filed under seal and/or redacted, Plaintiff will file the exhibits listed in paragraph 11 below in their
20 entirety under seal and his Memo and the exhibits listed in paragraph 12 below as redacted.
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22 7. Defendant has initially deemed all of the documents and excerpts of deposition
23 testimony Plaintiff quoted, cited to, referred to, or from which information was taken for his Memo
24 to contain confidential information, and has requested four weeks in which to complete its
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1 declaration regarding which specific documents and/or deposition testimony should be filed under
 2 seal.

3 8. Specifically, the following portions of the Memo contain quotations, references to,
 4 or information taken or derived from documents or materials designated as “Confidential” by
 5 Defendant:

Page	Lines
iv	6-10
1	6-8, 14-15
2	4-15, 25
3	7-8, 14-28
4	1-17, 19-27
5	1-19, 24-28
6	1-28
7	1-23
8	12-26
9	1-25, 27
10	1-4
12	1-2, 18, 25
20	24
21	2-3, 9-25
22	1-5

9. As the designating party, Defendant has the burden to establish that the designated information is sealable. Civil L.R. 79-5(e).

10. Attached hereto are redacted and unredacted versions of the Memo and the expert reports of Bruce Silverman, Dr. Gary Pusillo, and Colin B. Weir.

11. Below is a list identifying the supporting exhibits proposed to be filed under seal in their entirety.

Exhibit No.	<u>Document</u>
1	WLPT00002479
2	Excerpts from the September 13, 2018, deposition of Melissa Laich
5	WLPT00008059
6	WLPT00008105
7	Defendants' Corrected Supplemental Answers to Plaintiffs First Set of Interrogatories to Defendants, served July 6, 2018
8	WLPT00009015
10	Excerpts from the September 11, 2018, deposition of Digvijay Gurung
11	WLPT00008729
12	WLPT00008731
13	WLPT00008733
14	WLPT00008737
15	WLPT00006785
16	WLPT00008727
17	WLPT00008739
18	WLPT00008742

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19	WLPT00008749
20	WLPT00008756
21	WLPT00008759
22	WLPT00008762
23	WLPT00008752
24	Excerpts from the September 19, 2018, deposition of Greg Kean
25	WLPT00001597
26	WLPT00001592
27	GENI00004311
28	WLPT00006833
29	WLPT00002378
32	WLPT00000021
33	WLPT00000026
34	WLPT00014986

12. Below is a list identifying the documents that will be filed as redacted:

Exhibit No.	<u>Document</u>
3	June 29, 2020, expert report of Bruce Silverman
9	June 29, 2020, expert report of Dr. Gary Pusillo
31	June 29, 2020, expert report of Colin B. Weir
	Plaintiff's Memorandum in Support of Motion for Class Certification

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

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4 Executed this 29th day of June 2020.

5
6 s/ Rebecca A. Peterson

7 Rebecca A. Peterson

8 *Attorney for Plaintiff*
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